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April 18, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

Re: *Ex Parte* - CC Docket No. 95-116 - Local Number Portability

Dear Mr. Caton:

This is to advise that Duane Johnson of GTE Telephone Operations and I had several meetings yesterday with the following Commission staff personnel to review GTE's position with respect to local number portability:

(1) Regina Keeney, Richard Metzger, Larry Atlas, Melissa Newman and Jason Karp of the Common Carrier Bureau;

(2) James Casserly of Commissioner Ness' office;

(3) Daniel Gonzalez of Commissioner Chong's office; and

(4) John Nakahata of Chairman Hundt's office.

A copy of the talking paper used in the meetings is attached.

Two copies of this notice are filed in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Very truly yours,

C: James Casserly
Daniel Gonzalez
John Nakahata
Regina Keeney
Richard Metzger
Larry Atlas
Melissa Newman
Jason Karp

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LOCAL NUMBER PORTABILITY
GTE

INTRODUCTION

- KEY POINTS OF TELECOM ACT RELATED TO LNP.

  Central role for the Commission

  Service Provider Portability Required (at a minimum)

  Technically feasible number portability (required)

  Competitively neutral cost recovery

  Quality, reliability, and convenience of service maintained

- GTE PARTICIPATION IN THE STATE LEVEL INDUSTRY PROCESSES.

  GTE Participates in LNP workshops in Illinois, California, Washington, and Georgia.

  GTE actively participates in industry fora.

OBJECTIVES FOR LNP

- RELIABLE, ECONOMICAL, NATIONALLY CONSISTENT SOLUTION SET.
- MINIMIZE THE IMPACT ON NETWORK PERFORMANCE AND SERVICES.
- MAINTAIN FLEXIBILITY FOR NETWORK FUTURE DEVELOPMENT.
- "TECHNICALLY FEASIBLE" SHOULD INCLUDE PERFORMANCE, RELIABILITY, AND ECONOMIC FACTORS

PERFORMANCE FACTORS

- PRESERVATION OF NETWORK FUNCTIONALITY.
  Performance parameters such as post-dial delay must not be adversely affected in the perception of the customer in the portability environment.

  The geographic nature of the "existing" numbers must not be diluted.
- PRESERVATION OF NETWORK SERVICES.
  CLASS, AIN, and other network services must retain their utility to customers in a portability environment.
- PRESERVATION OF NETWORK FLEXIBILITY FOR FUTURE EVOLUTION.
  Past or current technologies must not be frozen in place in order to provide a quick, incomplete, and inflexible solution.

  Carriers and suppliers must be free to, and have the incentive to develop improved technologies to provide cost savings and new features and services.

RELIABILITY FACTORS

- ANY LNP SOLUTION WILL EMBED PROFOUND CHANGES IN THE NETWORK STRUCTURE AND ITS SUPPORTING SYSTEMS.
  All of the proposed solutions must introduce new functions into switch operations.

  Replacing the actual switch identification with the customer's ported number.

  Providing the correct name and number identification on outgoing calls.

  Providing the correct location identification to E911 databases.

- INADEQUATE CONSIDERATION OF "COMMON" ISSUES IN STATE WORKSHOPS.
  The State workshops have been biased toward "comparative analysis" of proposed LNP solutions. This means that implementation problems "common" to all considered solutions were either glossed over, or entirely ignored.

- INTERWORKING OF "PORTABILITY ISLANDS" NEEDS THOROUGH EXAMINATION TO ENSURE THE CONTINUATION OF A "SEAMLESS NETWORK."
  It is obvious that some areas will have portability before it is implemented in other adjacent areas. The industry workshops have not even identified how those areas will be identified, much less how calls between them will be handled.

  A uniform method of handling calls between areas of portability and non portability is necessary.

  A uniform method for dealing with routing failures is required, including agreement on how the customer can receive assistance in completing calls.

ECONOMIC FACTORS

- LNP DEPLOYMENT SHOULD BE ORDERLY, PHASED IN AS REQUIRED.
  In areas of GTE's network where there is a mixture of analog and digital switching, portability is not technically feasible until all of the switching platforms are upgraded to digital. Although GTE has a high penetration of digital switching overall, our conversion plans are driven by individual market requirements.

  Clearly any technically feasible LNP solution will require, at the minimum, digital switching platforms and complete SS7 connectivity within the portability area. Even in areas where we have 100% digital switching, the trunking networks would require complete replacement of local MF trunking to accomplish full SS7 connectivity. This is true even in areas where all of the switching platforms are digital.

- COST OF IMPLEMENTING LNP FALLS UNEVENLY ON PARTICIPANTS
  Implemenation cost of LRN for Chicago has been estimated at $100 million.

- COST RECOVERY SHOULD BE BROADLY BASED TO ASSURE COMPETITIVE NEUTRALITY.
  GTE supports a pooling of costs approach to cost recovery. This would assess every customer of telephone service a set amount, regardless of their service provider. This would alleviate the problem of customers avoiding support for LNP by switching service providers.

LOCATION ROUTING NUMBER SOLUTION

- LRN IS STILL UNDER DEVELOPMENT.
  LRN needs to become stable enough to sustain laboratory and field trials to assure it meets any reasonable definition of "technically feasible."

- AS PROPOSED, LRN FREEZES TECHNOLOGICAL INNOVATION INTO A 1980s TECHNOLOGY.

- BECAUSE OF LRN's IMMATURITY, RELIABLE COSTS ARE NOT AVAILABLE.

STATUS OF STATE WORKSHOPS

- "ENDORSEMENT" OF LRN IS PREMATURE.
  The State workshops have been biased toward comparative analysis of proposed LNP solutions. This means that implementation problems common to all considered solutions were either glossed over, or entirely ignored.

  It is obvious that some areas will have portability before it is implemented in other adjacent areas. The industry workshops have not even identified how those areas will be identified, much less how calls between them will be handled.

  A uniform method of handling calls between areas of portability and non-portability is necessary.

  A uniform method for dealing with routing failures is required, including agreement on how the customer can receive assistance in completing calls.

- THE STATES NEED A SET OF CRITERIA FOR DETERMINING "TECHNICAL FEASIBILITY."

CONCLUSION

- LNP INTRODUCES A FUNDAMENTAL NEW TECHNOLOGY TO THE PUBLIC NETWORK THAT SHOULD NOT BE IMPLEMENTED WITHOUT THOROUGH CONSIDERATION FOR TECHNICAL, ECONOMIC, AND RELIABILITY FACTORS.

- LNP DEPLOYMENT SHOULD BE ORDERLY, PHASED IN AS REQUIRED.
  In areas of GTE's network where there is a mixture of analog and digital switching, portability is not technically feasible until all of the switching platforms are upgraded to digital. Although GTE has a high penetration of digital switching overall, our conversion plans are driven by individual market requirements.

  Clearly any technically feasible LNP solution will require, at the minimum, digital switching platforms and complete SS7 connectivity within the portability area. Even in areas where we have 100% digital switching, the trunking networks would require complete replacement of local MF trunking to accomplish full SS7 connectivity. This is true even in areas where all of the switching platforms are digital

- THE APPROPRIATE COST RECOVERY MECHANISM IS AN ASESSMENT ON ALL TELECOMMUNICATIONS PROVIDERS TO ASSURE COMPETITIVE NEUTRALITY.

- THE COMMISSION SHOULD DECLARE THAT REMOTE CALL FORWARDING IS THE ONLY "TECHNICALLY FEASIBLE" LNP METHOD AT THE PRESENT TIME.

- THE COMMISSION SHOULD PROVIDE GUIDANCE TO THE INDUSTRY FORUMS CONSIDERING LNP ISSUES SO THAT A FLEXIBLE, RELIABLE, AND EFFICIENT LNP METHOD CAN BE DEVELOPED IN A MINIMUM TIME.
  The FCC should order that T1S1.3 develop standards by a specific date to support routing ported calls between carriers.

  The FCC should order INC or ICCF to development agreements and procedures by a specific date for interworking between areas of portability and areas where portability has not yet been implemented.

  The FCC should prohibit the states from mandating any specific LNP solution unless and until a minimum set of technical, reliability, and performance criteria ensuring technical feasible is met.

- THE COMMISSION SHOULD ACTIVELY MONITOR THE STATE TRIALS TO ASSURE THAT SUFFICIENT INFORMATION IS DEVELOPED TO ALLLOW IT TO MAKE AN INFORMED DECISION ON TECHNICAL FEASIBILITY ISSUES.